

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARK ROTHSCHILD,)	Case No. MISC.
)	
)	[related to Civil Action No.
Plaintiff)	1:19-cv-05240 pending in the
)	United States District Court
v.)	for the Eastern District of
)	New York]
GENERAL MOTORS LLC,)	
)	
)	
Defendant.)	

**SENSATA TECHNOLOGIES, INC.'S MOTION TO QUASH THIRD-PARTY
SUBPOENA TO PRODUCE DOCUMENTS**

Sensata Technologies, Inc. moves to quash the subpoena Plaintiff Mark Rothschild (“Plaintiff” or “Rothschild”) served in the lawsuit *Mark Rothschild v. General Motors, LLC*, No. 1:19-cv-05240, in the United States District Court for the Eastern District of New York.

- The subpoena imposes an undue burden on non-party Sensata under Federal Rule of Civil Procedure 45 because it requires Sensata to search for, review and produce documents responsive to twenty-five (25) separate and overly broad requests for an unlimited time period, it requires Sensata to conduct this process for records requested from, and obtained from, General Motors, LLC, and it requires the production of documents that are not relevant to the remaining claim in the operative complaint.
- The subpoena fails to allow a reasonable time for Sensata to comply because it gives just fourteen (14) days to search for, review and produce responsive information.
- The subpoena is also objectionable because it seeks confidential and privileged information from a non-party.

There is no justification for Rothschild to burden Sensata with the time and costs associated with searching for, reviewing and producing documents already sought from and produced by General Motors LLC, documents that are not relevant to Rothschild’s narrow remaining claim under GBL §349, and documents that are confidential and privileged. Sensata respectfully requests that the Court quash the subpoena, sustain its objections and award Sensata all of its costs

incurred in responding to the subpoena, including attorneys' fees, under Rule 45(d)(1).

Wherefore, for the reasons detailed above and set forth more fully in the accompanying memorandum, declaration and exhibits which are incorporated herein, Sensata respectfully requests that the Court quash Rothschild's subpoena under Federal Rule of Civil Procedure 45(d)(3) and award Sensata any costs of compliance, including the costs and fees incurred in quashing the subpoena under Rule 45(d)(1).

RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a), counsel for Sensata has conferred with counsel for Rothschild in a good faith attempt to resolve or narrow the issues raised by this Motion.

LOCAL RULE 37.1(a) CERTIFICATION

Pursuant to Local Rule 37.1(a), counsel for Sensata has conferred with counsel for Rothschild in a good faith attempt to resolve or narrow the areas of disagreement raised by the Motion to the greatest possible extent.

Dated: August 5, 2021

Respectfully submitted,
SENSATA TECHNOLOGIES, INC.,
DEFENDANT,
By its attorney,

By /s/ Michael T. McCormack
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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2021, the following documents were served on counsel for the parties identified by email and regular mail at the addresses below:

-Motion to Quash

-Declaration of Timothy P. Jensen and attached Exhibits

-Memorandum in Support of Motion to Quash

-Corporate Disclosure Statement

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